

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 4:14-CR-00175 AGF (DDN)
	)	
MARK PALMER <i>et. al</i> ,	)	
	)	
Defendant.	)	

**DEFENDANTS' JOINT MOTION FOR EXTENSION OF TIME  
TO FILE OBJECTIONS TO ORDER AND RECOMMENDATION  
ON MOTIONS TO DISMISS AND FOR BILL OF PARTICULARS**

COME NOW Defendants, by and through their respective undersigned counsel, and hereby move for this Court to extend the deadline to file objections to the Order and Recommendation on Motions to Dismiss and for Bill of Particulars to August 18, 2016. Defendants' Motion is made without objection from the Government. In support of their motion, Defendants state as follows:

1. On July 19, 2016 the Court entered its Order and Recommendation on Motions to Dismiss and for Bill of Particulars [Doc. # 271] ("Order and Recommendation") and provided Defendants until August 4, 2016 to file documentary objections to its Order and Recommendation.

2. Defendants now move this Honorable Court for an additional fourteen (14) days to file their objections, specifically up to and including August 18, 2016, and the instant Motion is made without objection from the Government.

3. Counsel for Defendant Robert Wolfe has surgery scheduled for August 3, 2016, and as a result Counsel will be limited in his ability to work for a period thereafter.

Said surgery is a follow up to a previous procedure on July 13, 2016. Additional time to file objections is necessary in light of Counsel's medical needs.

4. The Court's Order and Recommendation was written in response to three motions to dismiss and one Motion for Bill of Particulars. The volume of the subject matter at hand requires additional time for Counsels for the Defendants to prepare their objections.

5. Counsels for the undersigned Defendants have met and will continue to meet to potentially draft joint objections to the Order and Recommendation. Additional time is necessary for Counsel to confer and prepare one joint response. Such joint response benefits judicial economy in the instant case.

6. Counsel for Defendant Robert Wolfe communicated with Assistant United States Attorney James Delworth regarding the extension of time sought by this Motion, and the Government does not object to the relief requested by Defendants being granted by the Court.

WHEREFORE, for the foregoing reasons, Defendants jointly request that the Court grant their motion for as extension of time to file documentary objections to the Order and Recommendation on Motions to Dismiss and for Bill of Particulars [Doc. # 271] to August 18, 2016.

Dated: July 26, 2016

Respectfully submitted,

BOROWIAK LAW FIRM

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 26th day of July, 2016, a true and correct copy of the foregoing was filed with the Court using the CM/ECF system, and service upon all participants in the case who are CM/ECF users will be accomplished by operation of that system.

/s/Zachary J. Borowiak